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March 3, 2020

BY ECF

Honorable Edgardo Ramos
40 Foley Square
New York, New York 10007

Re: Jane Does Nos. 1-10 v. Nygard et al., No. 20-cv-01288 (ER)

Dear Judge Ramos:

This firm represents the Defendants in the referenced matter, and we write jointly on behalf of both Plaintiffs and Defendants to request that the Court adjourn the pre-motion conference that currently is scheduled for this Thursday, March 5, 2020, at 3:45 pm. Additionally, Plaintiffs request that the Court set April 13, 2020, as their deadline to file an amended complaint. This is the parties' first request for an adjournment of the pre-motion conference.

On February 20, 2020, Defendants submitted a letter requesting a pre-motion conference in anticipation of filing a motion to dismiss and to strike Plaintiffs' initial complaint. Plaintiffs submitted a letter in response on February 27, 2020, in which they represented that they intended to file an amended complaint within 30 to 45 days. Defendants previously had informed Plaintiffs that Defendants would not object to their filing an amended complaint within that time frame.

Because Plaintiffs intend to file an amended complaint, the parties respectfully submit that it would be most efficient to defer the pre-motion conference until after Plaintiffs have filed their amended complaint. Accordingly, the parties respectfully request that the Court adjourn the pre-motion conference that currently is scheduled for March 5, 2020. Plaintiffs further respectfully request that the Court set April 13, 2020, as their deadline to file an amended complaint.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

Respectfully submitted,

/s/ Christopher B. Harwood

Christopher B. Harwood

Cc: Plaintiffs' counsel (by ECF)